

**UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF NEW YORK**

SNIP ITS DADM KIDZ CUTS II, LLC d/b/a  
SNIP-ITS,

Plaintiff,

vs.

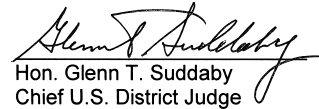
THE HANOVER INSURANCE GROUP,  
INC. and MASSACHUSETTS BAY  
INSURANCE COMPANY,

Defendants.

Civil Action No. 1:20-cv-00772 (GTS-DJS)

**STIPULATION PURSUANT TO F.R.C.P.  
41 FOR VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE**

IT IS SO ORDERED:

  
Hon. Glenn T. Suddaby  
Chief U.S. District Judge

Dated: 1/25/2021

Syracuse, NY

Pursuant to Fed. R. Civ. P. 41(a), it is hereby stipulated and agreed, by and between the undersigned counsel, that Plaintiff Snip Its Dadm Kidz Cuts II, LLC d/b/a Snip Its dismisses this action without prejudice and without costs against any party.

**IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be executed in counterparts, that facsimile and/or electronic copies of this Stipulation shall be deemed originals, and that this Stipulation may be filed with the Clerk of the Court without further notice to the parties.

By: /s/ Elmer Robert Keach III  
ELMER ROBERT KEACH III, ESQ.  
NDNY Bar Roll No.: 601537  
**LAW OFFICES OF ELMER  
ROBERT KEACH III, PC**  
One Pine West Plaza, Suite 109  
Albany, New York 12203  
*Attorney for Plaintiff*  
*Snip Its Dadm Kidz Cuts II, LLC d/b/a*  
*Snip Its*

Dated: January 22, 2021

By: /s/ Jonathan M. Zagha  
JONATHAN M. ZAGHA, ESQ.  
NDNY Bar Roll No.: 701977  
**FINAZZO COSSOLINI O'LEARY  
MEOLA & HAGER, LLC**  
67 East Park Place – Suite 901  
Morristown, New Jersey 07960  
*Attorneys for Defendant*  
*Massachusetts Bay Insurance Company*

Dated: January 22, 2021